

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

MICHAEL J. FLYNN

Plaintiff

VS.

LAFAYETTE RONALD HUBBARD

a/k/a L. RON HUBBARD

Defendant

CIVIL ACTION
NO. 83-2642-C

AFFIDAVIT OF MICHAEL J. FLYNN.

I, Michael J. Flynn, depose as follows:

1. I am the plaintiff herein, a member of the Massachusetts Bar engaged in the private practice of law in the City of Boston.
2. Since 1979 I have been involved in litigation against the Church of Scientology ("Scientology") both as a party and as an attorney representing parties.

I currently represent thirty-five plaintiffs and defendants in litigation with Scientology. These include former members of Scientology, journalists and

parents of members. I have also served as special counsel to the City of Clearwater, Florida relative to Scientology matters. The information set forth in this Affidavit is based on my personal knowledge and on information received in connection with the aforementioned litigation.

3. I am co-counsel for petitioner in the case In Re Estate of L. Ron Hubbard, #47150 (Riverside Sup. Ct., Calif.), one of the primary purposes of which was to determine whether L. Ron Hubbard was or was not a missing person. For seven months he failed to appear, then the day before the Court stated that it would appoint a Trustee Hubbard filed, through Mary Sue Hubbard, a declaration to the effect that he was not a missing person. A copy of this declaration is annexed to the motion for substituted service in Exhibit "G".
4. Based on extensive contact with the agencies set forth below, I know that L. Ron Hubbard is currently under investigation by the I.R.S., the F.B.I., the Toronto Provincial Police, the Arizona Attorney General and the Florida Department of Law Enforcement as well as several other state and federal agencies.